

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Docket No. 20-cr-40036-TSH
	)	
	)	
VINCENT KIEJZO	)	
	)	

**ASSENTED-TO MOTION TO CONTINUE STATUS CONFERENCE**

Now comes the defendant, Vincent Kiejzo, and requests that this Honorable Court continue the final status conference presently scheduled for December 20, 2021 to a date after January 13, 2022.

As grounds, the defendant states that resolution of the defendant's appeal of the denial of his motion to compel discovery (*see* D.E. #117) is still pending. That matter was initially scheduled for a hearing this week before the District Judge but was continued at the government's request. That motion hearing, and resolution of the defendant's objections to the discovery order, is now scheduled to take place on January 13, 2022. (*See* D.E. # 125). Counsel for the defendant submits that the resolution of discovery matters and her review of any production of the requested discovery, if so ordered, will enable her to more accurately report for a final status conference in this case as to the nature of, and time necessary to prepare and file, substantive motions.

The defendant agrees to exclude from the calculation of the time within which the defendant must be brought to trial under the Speedy Trial Act, 18 U.S.C. §3161, et seq., the period between the initial pretrial conference on September 23, 2021 and the newly scheduled pretrial conference. As grounds therefor, the defendant states that ends of justice served by continuing the matter in order to afford the parties sufficient time to fully litigate outstanding discovery issues,

and to permit the defendant to file any additional discovery and/or substantive motions. The parties therefore request that the Court exclude said period under the Speedy Trial Act.

Undersigned counsel has conferred with Assistant U.S. Attorney Kristen Noto and understands that the government assents to this motion.

Respectfully submitted,  
VINCENT KIEJZO

By his Attorney,

/s/ Sandra Gant  
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on December 16, 2021.

/s/ Sandra Gant  
Sandra Gant